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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,
 	
                      Plaintiff,
 	
      v.
 	
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,
 	
                      Defendant.
	Adv. Pro. No. 08-01789 (CGM)
	
	SIPA Liquidation
	
	(Substantively Consolidated)

In re: BERNARD L. MADOFF, Debtor.	

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,
 	
                      Plaintiff,
 	
      v.
 	
JEROME GOODMAN, Individually, as trustee for The Jerome Goodman Children's GRAT #1, as Limited Partner of Goodman Capital Partners L.P., and as Beneficiary of The Jerome Goodman Children's GRAT #1, *et al.,*
 	
                      Defendants.
	Adv. Pro. No. 10-04545 (CGM)

NOTICE OF MEDIATION REFERRAL AND MEDIATOR SELECTION

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order").[1] *See* ECF No. 3141. Pursuant to the Notice of Applicability filed by Plaintiff Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*lll* ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff individually ("Madoff"), in this Adversary Proceeding on December 1, 2010 (ECF. No. 1), the Order and the avoidance procedures contained therein (the "Avoidance Procedures") are applicable to the instant matter.

Pursuant to the Avoidance Procedures, the Trustee and Defendants may jointly agree to enter mediation prior to or upon completion of discovery without further court order. Avoidance Procedures, ¶ 5A. Through this Notice of Mediation Referral and Mediator Selection, the Trustee and Defendants (the "Parties") hereby state that they have completed discovery in the above-referenced adversary proceeding and agree to be referred to mandatory mediation at this time.

Further, pursuant to the Avoidance Procedures and the Mediation Order, the Parties hereby mutually select the Honorable Allen Hurkin-Torres (Ret.) to act as Mediator in this matter.[2] The Parties further agree to contact the Honorable Allen Hurkin-Torres as soon as practicable after this Notice of Mediator Selection is filed with the Court.

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[1] All terms not defined herein shall be given the meaning ascribed to them in the Order.

[2] The parties note that Judge Hurkin-Torres is not on the Register of Mediators for the United States Bankruptcy Court for the Southern District of New York, but both parties have consented to use Judge Hurkin-Torres.

The Parties further agree that no person shall act as Mediator if that person, or that person's law firm, currently represents a party with respect to the BLMIS proceeding, unless the Parties provide prior written consent that the person may act as Mediator.

Pursuant to the Avoidance Procedures, the Parties agree that this mediation will conclude within 120 days from the date that this Notice of Mediator Selection is filed, unless that deadline is extended by mutual consent of the Parties and the Mediator.

Dated: New York, New York
March 22, 2021

BAKER & HOSTETLER LLP

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